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July 31, 2024

VIA ECF

United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: *Association of New Jersey Rifle & Pistol Clubs, Inc., et al. v. Platkin, et al.*
("ANJRPC"), No. 3:18-cv-10507; *Cheeseman, et al. v. Platkin, et al.*, No.
1:22-cv-04360; *Ellman, et al. v. Platkin, et al.*, No. 3:22-cv-04397

Dear Judge:

The State writes regarding the Court's Memorandum (Dkt. 228) and Order and Judgment (Dkt. 229) in the above-captioned cases.¹ The State is considering filing a motion for reconsideration and/or a motion for a stay pending appeal in the district court as required by Federal Rule of Appellate Procedure 8(a)(1), and requests a conference with Your Honor to discuss a briefing schedule for these potential motions. For example, the Order and Judgment provides that "the effect of this Order and Judgment is *sua sponte* stayed for thirty days." (Dkt. 229). However, that will not be enough time for an appeal in this matter to be resolved. Thus the State expects that a motion to this Court for a stay pending appeal is necessary, and seeks to confer with the Court about the briefing schedule for that motion and a potential motion for reconsideration.

Thank you for your consideration.

Respectfully yours,

/s/ Christopher J. Ioannou
Christopher J. Ioannou
Deputy Attorney General

Cc: All counsel via ECF

¹ All docket references are to the lead case, *ANJRPC*, No. 3:18-cv-10507.

